

# COHEN & GREEN

January 9, 2024

Hon. Analisa Torres, U.S.D.J.  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

By Electronic Filing.

**Re: Case No. 23-cv-1017 (AT), Erlick v. White**

Dear Judge Torres:

My firm and I represent Plaintiff Eli Erlick in this case. I write to ask the Court to enter an order compelling Defendant's initial disclosures by a date certain.

Under the Court's Order at ECF No. 45, initial disclosures were to be served at the latest by January 3, 2023. We have not, however, received Defendant's.

I have followed up multiple times with Defendant's counsel in an attempt to avoid this motion and have not received any response whatsoever. Nor did I receive any out of office or other message suggesting counsel might not be receiving my messages. Frankly, I find all of this strange, because my working relationship with Defendant's counsel has otherwise been extremely productive and communicative.

In order to conserve resources and ideally simply get things served, therefore, Plaintiff asks that the Court simply enter an order requiring production of initial disclosures within a short time frame — Plaintiff suggests 3 business days. If disclosures are still not served by that deadline, Plaintiff can submit a letter on other remedies.

As ever, I thank the Court for its time and consideration.

Respectfully submitted,

/s/

J. Remy Green

*Honorific/Pronouns: Mx., they/their/them*

**COHEN & GREEN P.L.L.C.**

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cc:

All relevant parties by ECF.